

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

BISOUS BISOUS LLC, §
Plaintiff, §
v. § C.A. No. 3:21-cv-01614-B
THE CLE GROUP, LLC, §
BISOU UPTOWN MANAGER, LLC, and §
JOHN DOES 1-10, §
Defendants. §

**DEFENDANTS' UNOPPOSED MOTION FOR A 1-DAY EXTENSION OF TIME TO
FILE RESPONSE TO PLAINTIFF'S MOTION FOR ORDER TO SHOW CAUSE**

Defendants The CLE Group, LLC and Bisou Uptown Manager, LLC hereby moves the Court for an Order extending Defendants' deadline to file a Response to Plaintiff's Motion for Order to Show Cause from September 8, 2021 until September 9, 2021. In support of their motion, Defendants states as follows:

1. Defendants' counsel's personal commitments and the Labor Day week has prevented or delayed counsel from obtaining all requested information for the Response from Defendants, and the Response may not be completed by the end of the day tomorrow, September 8, 2021, the current deadline for its filing.
2. Counsel is seeking a 1-day extension to file the Response to Plaintiff's Motion for Order to Show Cause.
3. Plaintiff does not oppose the motion.
4. Defendants' motion is not filed for delay or any improper purpose.

For foregoing reasons, Defendants respectfully request that their motion for a 1-day extension of time to respond to Plaintiff's Motion for Order to Show Cause be granted.

Dated: September 7, 2021

Respectfully submitted,

BUETHER JOE & COUNSELORS, LLC

By: /s/ Kenneth P. Kula

Eric W. Buether
State Bar No. 03316880
Eric.Buether@BJCIPLaw.com
Christopher M. Joe
State Bar No. 00787770
Chris.Joe@BJCIPLaw.com
Kenneth P. Kula
State Bar No. 24004749
Ken.Kula@BJCIPLaw.com

1700 Pacific Avenue
Suite 4750
Dallas, Texas 75201
Telephone: (214) 730-5660
Facsimile: (972) 707-1248

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on this date he conferred with Plaintiff's counsel, Mr. David Conrad, requesting a 1-day extension to respond to Plaintiff's Motion for Order to Show Cause. Counsel for Plaintiff stated that the instant motion is unopposed. *See* Local Rule CV-7.1(a), (b).

/s/ Kenneth P. Kula
Kenneth P. Kula

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5.1(d) on this 7th day of September, 2021.

/s/ Kenneth P. Kula
Kenneth P. Kula